

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>BOAZ PLEASANT-BEY,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action Number 3:19-CV-486</b>
	)	<b>District Judge Aleta A. Trauger</b>
<b>STATE OF TENNESSEE,</b>	)	<b>Jury Demand</b>
<b>TENNESSEE DEPARTMENT</b>	)	
<b>OF CORRECTIONS, REVEREND</b>	)	
<b>BRIAN DARNELL, TONY</b>	)	
<b>PARKER, CORECIVIC, INC.,</b>	)	
<b>JON SHONEBARGER, TOM SIMIC,</b>	)	
<b>and RUSSELL WASHBURN,</b>	)	
	)	
<b>Defendants.</b>	)	

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**SECOND SUPPLEMENTAL INITIAL DISCLOSURES**

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Defendants CoreCivic, Inc. (“CoreCivic”), Jon Shonebarger (“Shonebarger”), and Russell Washburn (“Washburn”) submit their initial disclosures in compliance with Federal Rule of Civil Procedure 26(a)(1)(A).

- I. Federal Rule of Civil Procedure 26(a)(1)(A)(i):** The name and, if known, the address and telephone number of each individual likely to have discoverable information -- along with the subjects of that information -- that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.
- A. Raymond Byrd has knowledge regarding Plaintiff Boaz Pleasant-Bey’s (“Pleasant-Bey”) incarceration at the Trousdale Turner Correctional Center (“Trousdale”), the customs, policies, education, and training at Trousdale, and the allegations in this lawsuit and may be contacted through the undersigned counsel.
  - B. Emari Dawson has knowledge regarding Pleasant-Bey’s incarceration at Trousdale, the customs, policies, education, and training at Trousdale, and the allegations in this lawsuit, and may be contacted through the undersigned counsel.
  - C. Martin Frink has knowledge regarding Pleasant-Bey’s incarceration at Trousdale, the customs, policies, education, and training at Trousdale, and

the allegations in this lawsuit and may be contacted through the undersigned counsel.

- D. Donnelle Harris has knowledge regarding Pleasant-Bey's incarceration at Trousdale, the customs, policies, education, and training at Trousdale, and the allegations in this lawsuit and may be contacted through the undersigned counsel.
- E. Scottie Hudson has knowledge regarding Pleasant-Bey's incarceration at Trousdale, the customs, policies, education, and training at Trousdale, and the allegations in this lawsuit, and may be contacted through the undersigned counsel.
- F. Daniel Knight has knowledge regarding Pleasant-Bey's incarceration at Trousdale, the customs, policies, education, and training at Trousdale, and the allegations in this lawsuit, and may be contacted through the undersigned counsel.
- G. Rodney McCloud has knowledge regarding Pleasant-Bey's incarceration at Trousdale, the customs, policies, education, and training at Trousdale, and the allegations in this lawsuit and may be contacted through the undersigned counsel.
- H. Jacqueline Norman has knowledge regarding Pleasant-Bey's incarceration at Trousdale, the customs, policies, education, and training at Trousdale, and the allegations in this lawsuit and may be contacted through the undersigned counsel.
- I. Yolanda Pittman has knowledge regarding Pleasant-Bey's incarceration at Trousdale, the customs, policies, education, and training at Trousdale, and the allegations in this lawsuit and may be contacted through the undersigned counsel.
- J. Shonebarger has knowledge regarding Pleasant-Bey's incarceration at Trousdale, the customs, policies, education, and training at Trousdale, and the allegations in this lawsuit and may be contacted through the undersigned counsel.
- K. Tom Simic has knowledge regarding Pleasant-Bey's incarceration at Trousdale, the customs, policies, education, and training at Trousdale, and the allegations in this lawsuit and may be contacted through the undersigned counsel.
- L. Vincent Vantell has knowledge regarding Pleasant-Bey's incarceration at Trousdale, the customs, policies, education, and training at Trousdale, and the allegations in this lawsuit and may be contacted through the undersigned counsel.

- M. Russell Washburn has knowledge regarding Pleasant-Bey's incarceration at Trousdale, the customs, policies, education, and training at Trousdale, and the allegations in this lawsuit and may be contacted through the undersigned counsel.
  - N. Brandon Watwood has knowledge regarding Pleasant-Bey's incarceration at Trousdale, the customs, policies, education, and training at Trousdale, and the allegations in this lawsuit and may be contacted through the undersigned counsel.
  - O. Agents and employees of CoreCivic identified in documents regarding Pleasant-Bey may have knowledge regarding Pleasant-Bey's incarceration at Trousdale, the customs, policies, education, and training at Trousdale, and the allegations in this lawsuit and may be contacted through the undersigned counsel.
  - P. Defendants may rely on individuals who have been deposed in this matter who have not specifically been identified, including Chris Brun, Vincent Finamore, Robert Hill, Tony Parker, Jon Walton, and Kelly Young.
  - Q. Defendants may rely upon individuals identified in documents produced or subpoenaed in this litigation along with individuals identified by Pleasant-Bey, on the one hand, and the State of Tennessee, the Tennessee Department of Correction ("TDOC"), Reverend Brian Darnell, and Tony Parker (the "State Defendants"), on the other hand, in this lawsuit.
- II. Rule 26(a)(1)(A)(ii):** A copy of -- or a description by category and location -- of all documents, electronically-stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.
- A. CoreCivic Corporate and Facility Policies
  - B. Trousdale Inmate Handbook
  - C. Agreements Between CoreCivic and Trinity Services I, LLC
  - D. American Correctional Association ("ACA") Accreditation Report
  - E. Prison Rape Elimination Act ("PREA") Compliance Report
  - F. TDOC Ramadan Memos
  - G. Volunteer Recruitment Communications
  - H. Pleasant-Bey Grievances
  - I. Pleasant-Bey Religious Accommodation Requests and Responses

- J. Pleasant-Bey Institutional File
- K. Pleasant-Bey Medical Records
- L. Communications and Memos on Pleasant-Bey's Religious Requests and on Facility Religious Accommodations, Meals, Requests, and Services
- M. Trousdale Daily Shift Rosters
- N. Trousdale Staffing Patterns
- O. Documents that Demonstrate CoreCivic's Efforts to Hire Additional Staff and to Retain Staff and Documents Showing Staffing Levels
- P. To the Extent Needed, Documents Regarding Allegations of Violent Incidents that Pleasant-Bey May Raise
- Q. TDOC Use of Force Reports and Other Documents that Show Comparisons of Incidents at Facilities Across the State
- R. Audit Documents of the Facility, Including from the TDOC and the ACA and Regarding PREA Incidents
- S. TDOC Contract Monitor Reports and CoreCivic's Responses
- T. Comptroller Meeting Minutes, Including from November 26, 2018
- U. Documents Produced by CoreCivic, Shonebarger, and/or Washburn
- V. Documents Produced by Pleasant-Bey and/or the State Defendants

**III. Rule 26(a)(1)(A)(iii):** A computation of any category of damages claimed by the disclosing party -- who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary materials, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

A. This is not applicable to CoreCivic.

**IV. Rule 26(a)(1)(A)(iv):** For inspection and copying as under Rule 34 any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

A. Based upon the relief sought, CoreCivic does not believe that this is applicable to CoreCivic.

Respectfully submitted,



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*Counsel for Defendants CoreCivic,  
Inc., Jon Shonebarger, and Russell  
Washburn*

**CERTIFICATE OF SERVICE**

I certify that a true and exact copy of the foregoing has been served via U. S. Mail, first-class postage prepaid, this November 9, 2021, on the following:

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